

Exhibit E

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:) Chapter 11
TRONOX INCORPORATED, et al.,) No. 09-10156 (ALG)
Debtors.)
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TRONOX INCORPORATED, TRONOX) Adversary Proceeding
WORLDWIDE LLC f/k/a Kerr-McGee) No. 09-01198 (ALG)
Chemical Worldwide LLC, and TRONOX)
LLC f/k/a Kerr-McGee Chemical LLC,)
Plaintiffs,)
v.)
ANADARKO PETROLEUM CORPORATION)
and KERR-MCGEE CORPORATION,)
Defendants)
-----)
THE UNITED STATES OF AMERICA,)
Plaintiff-Intervenor,)
v.)
TRONOX, INC., TRONOX WORLDWIDE LLC,)
TRONOX LLC, KERR-MCGEE CORPORATION,)
ANADARKO PETROLEUM CORPORATION,)
Defendants.)

VIDEO DEPOSITION OF PERRY H. CHARLEY

1 10:51:20 way down, does it state that the lessee hereby agrees
2 10:51:23 "...promptly to surrender and return the premises upon the
3 10:51:28 termination of this lease to whomsoever shall be lawfully
4 10:51:33 entitled thereto, in as good condition as received, excepting
5 10:51:37 for the ordinary wear and tear and unavoidable accidents in
6 10:51:41 their proper use"?

7 10:51:43 A Yes, sir.

8 10:51:43 Q Okay. After the mining activities ceased on the
9 10:51:56 Kerr-McGee mines, were they returned in as good condition as
10 10:52:02 received?

11 10:52:05 A No, sir, not according to our inventory.

12 10:52:09 Q And based on your inventory, can you describe
13 10:52:12 generally how the Kerr-McGee mines were left after mining
14 10:52:15 ceased?

15 10:52:16 A The workings were still -- the underground workings
16 10:52:19 were still open. Vertical shafts were never covered up. There
17 10:52:26 were piles and tons of radioactive waste, protore, and in some
18 10:52:32 cases even ore, still left on site. There were pieces of old
19 10:52:35 mining equipment -- equipment.

20 10:52:40 In -- in many of the cases, there were man-made
21 10:52:44 cliffs. It's referred to as high walls, that pose a lot of
22 10:52:49 dangers to people who were unaware of those. A lot of
23 10:52:54 radioactive wastes were dumped over cliff faces or left on
24 10:52:59 site. We also found a lot of small drilled holes that were
25 10:53:07 still loaded. You could see where blasting caps and dynamite